

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

**JUAN MENDEZ, ET AL.,**

**Plaintiffs,**

**v.**

**PUERTO RICAN INTERNATIONAL  
COMPANIES, INC. ET AL.,**

**Defendant.**

**Civil No. 2005-174F/C  
Civil No. 2005-199**

**ACTION FOR  
DISCRIMINATION,  
WRONGFUL DISCHARGE  
AND DAMAGES**

**AFFIRMATION OF COUNSEL FOR BILL OF COSTS**

I, Linda J. Blair, declare and affirm as follows:

1. I am an attorney admitted to practice before the District Court of the Virgin Islands and I am counsel for HOVENSA, L.L.C. ("HOVENSA") in the above captioned matter.
2. A detailed description of the costs incurred and services performed in this matter on behalf of HOVENSA is set forth in Exhibit A. Moreover, in an effort to preserve privileged and confidential communications between HOVENSA, the insurance carrier, co-defendant's counsel and HOVENSA's counsel, the undersigned has redacted portions of the time entries that reveal attorney-client privileged information and/or information that is protected by the work-product doctrine.
3. The total amount of time spent and costs incurred in this matter from the inception of the case until the present, and for which HOVENSA seeks an award is:

**FEES**

<u>Timekeeper</u>	<u>Hours/Rate</u>	<u>Amount</u>
C. Beth Moss	8.0/200.00	\$ 1,600.00

*Acosta et. al. v. HOVENSA L.L.C.* Civil No. 2008/0089

Affirmation of Counsel

Page 2 of 3

Linda J. Blair	37.2/175.00	\$ 6,510.00
Linda J. Blair	2.3/200.00	\$ 460.00
Linda J. Blair	710.80/250.00	\$177,700.28
Linda J. Blair (travel)	23.50/125.00	\$ 2,937.50
John Brad Clark	245.65/85.00	\$ 20,880.25
Joseph Early	92.0/185.00	\$ 92.50
Thomas Kraeger	39.9/225.00	\$ 8,977.50
Trudy Phillip	6.80/65.00	\$ 442.00
Carl A. Beckstedt	47.10/250.00	\$ 11,775.00
Dustin J. Calhoun	5.90/225.00	\$ 1,327.50
Emily A. Shoup	85.50/225.00	\$ 19,237.50
Heather Rippl	61.50/225.00	\$ 13,837.50
Steve J. Silver	66.60/225.00	\$ 14,985.00
Patrick O'Laughlin	18.70/225.00	\$ 4,215.00
Sunshine S. Benoit	31.3/225.00	\$ 7,042.50
Sunshone S. Benoit	.5/250.00	\$ 125.00
Analisa Prince	.80/85.00	\$ 68.00
Deborah Worden	24.7/85.00	\$ 2,099.50
Lisa Mitchel Harris	.20/85.00	\$ 17.00
Total		\$ 294,329.53

**COSTS**

- |                                                  |             |
|--------------------------------------------------|-------------|
| 1. Deposition Transcript Fees:                   | \$26,767.34 |
| 2. Travel Expenses Necessary for Depositions:    | \$ 7,131.27 |
| 3. Copies of Documents Necessary for Depositions | \$ 708.20   |

4. I have personal knowledge of the facts relative to the above fees, and the fees are true and correct and were necessarily incurred in this matter. The aforesaid sums are fair and reasonable

*Acosta et. al. v. HOVENSA L.L.C.* Civil No. 2008/0089

Affirmation of Counsel

Page 3 of 3

and are based upon the firm's normal hourly rates for this client. Furthermore, the services charged herein were actually and necessarily performed, and HOVENSA agreed to compensate this firm in accordance with the hourly billing rates set out above. Total fees and costs set forth in this petition are: **\$328,936.34.<sup>1</sup>**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,  
**BRYANT BARNES BLAIR & BENOIT LLP**  
Attorneys for Defendant  
1134 King Street, 2<sup>nd</sup> Floor  
Christiansted, VI 00820  
Tel: (340) 773-2785 / Fax: (340) 773-5427  
Email: [lblair@bryantbarnes.com](mailto:lblair@bryantbarnes.com)

DATED: November 4, 2013

By: /s/Linda J. Blair  
Linda J. Blair  
V.I. Bar No. 773

---

<sup>1</sup> At the time of HOVENSA's Motion for Costs and Attorney's Fees, HOVENSA estimated costs and fees at \$328,228.14 through September 2013. The current number reflects the addition of copying costs necessary for depositions since pulled from the Invoices attached as Exhibit A (see billing for August 2010, invoiced in September 2010).